

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

BRIAN R. WALSH,

Defendant

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No. 18-CR-10399 - DPW

MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

Defendant Brian Walshe hereby moves this Court to modify his conditions of pretrial release to allow him to visit his mother-in-law who is receiving treatment at Brigham and Women's Hospital for a brain aneurysm. As grounds for this motion, Mr. Walshe states:

1. Mr. Walshe's mother-in-law, Milanka Ljubicic, suffered a brain aneurysm on December 21, 2021 and underwent emergency brain surgery that same day. She is currently hospitalized at Brigham and Women's Hospital. Mr. Walshe seeks permission to visit his mother-in-law daily at Brigham and Women's Hospital until her release, and to visit her daily after she is released from Brigham and Women's Hospital.

2. Mr. Walshe has been on total home confinement since October 8, 2021, pending the investigation into the issuance of a bank check by Hingham Savings Bank. He has been compliant with his conditions to date.

3. Counsel for Mr. Walshe contacted AUSA Tim Moran, however AUSA Moran is on vacation and is unable to take a position on this motion. Undersigned counsel also contacted Probation who takes no position on this motion.

WHEREFORE, Defendant respectfully requests that the Court modify his conditions of pretrial release to allow him to visit his mother-in-law.

Dated: December 23, 2021

Respectfully submitted,

BRIAN R. WALSH

By his attorneys,

/s/ Tracy A. Miner

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served by ECF on counsel for the government on December 23, 2021.

/s/ Tracy A. Miner

Tracy A. Miner